Exhibit A
DRAFT Model Water Treatment Plan
Version 2

DRAFT Model Water Treatment Plan; Version 2

Chemours Washington Works Plant, Washington, West Virginia

This document, the Model Water Treatment Plan: Version 2 dated May X, 2020, supersedes the Model Water Treatment Plan included as Exhibit A of the January 6, 2017 First Amendment to Order on Consent.

Agreed to:

_____ Date:_____

Roger Reinhart

Compliance and Enforcement Team Leader, Safe Drinking Water Act

U.S. EPA Region 3

Agreed to:

_____ Date:_____

Jennifer Wilson

Environmental Engineer

U.S. EPA Region 5

Agreed to:

_____ Date:_____

Andrew S. Hartten

Principal Remediation Project Manager

Chemours Corporate Remediation Group

Agreed to, if required:

_____ Date:_____

Name

Title

E. I. duPont de Nemours and Company

Model Water Treatment Plan

Chemours Washington Works Plant
Washington, West Virginia

Submitted on behalf of
The Chemours Company

Submitted by
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Sabre Building
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Newark, DE 19713

Project Number: 60593797/60595223
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1.0 MODEL WATER TREATMENT PLAN

In 2009, E. I. du Pont de Nemours and Company ("DuPont") and the United States Environmental Protection Agency ("EPA") entered into an Administrative Order on Consent (the "2009 Consent Order") regarding the presence of perfluorooctanoic acid ("PFOA") in certain drinking water supplies. As contemplated in the 2009 Consent Order, DuPont conducted several phases of surveying and sampling of public and private drinking water wells for PFOA in the vicinity of the Washington Works facility located in Wood County near Parkersburg, West Virginia. ~~Over 450 drinking water wells located in West Virginia and Ohio in the vicinity of the Washington Works facility have been sampled for PFOA.~~ In addition, DuPont offered granular activated carbon ("GAC") water treatment technology or a functionally equivalent alternative (as determined by DuPont and approved by EPA) to residents with private water systems containing PFOA at concentrations equal to or greater than 0.40 micrograms per liter ("µg/L") or parts per billion ("ppb"). This level of PFOA corresponds to the Provisional Health Advisory value for PFOA established by EPA in 2009.

The Chemours Company ("Chemours") now owns the Washington Works facility. Based on current science and changed circumstances, as well as new, site-specific information and the issuance by EPA on May 19, 2016, of a Lifetime Health Advisory value for PFOA of 0.07 ppb, EPA and DuPont have decided to amend certain provisions of the 2009 Consent Order and to add Chemours as a party to the 2009 Consent Order. Under the 2009 Consent Order as amended, Chemours is, among other things, offering to install GAC water treatment technology or a functionally equivalent alternative (as determined by Chemours and approved by EPA) for public and private water systems where validated sampling results show that PFOA is present at concentrations greater than 0.07 ppb.

This Model Water Treatment Plan has been developed to describe the manner in which treatment of drinking water at qualified locations will be implemented consistent with the requirements of the 2009 Consent Order as amended. Consistent with the requirements of Paragraph 42 of the 2009 Consent Order as amended, model water treatment plans for GAC treatment and for alternative treatment for both private and public water systems are described in the sections that follow. DuPont and Chemours are identified as Respondents in the 2009 Consent Order as amended. While this Model Water Treatment Plan describes actions that Chemours expects to take, references herein to Chemours should be understood to include DuPont if DuPont is implementing the provisions of the Model Water Treatment Plan pursuant to the 2009 Consent Order as amended. If any provision of this Model Treatment Plan conflicts with any provision in the 2009 Consent Order as amended, the 2009 Consent Order as amended will control.

EPA divides public water systems into "community water systems" and "non-community water systems."[1] Typically, large public water supply systems qualify as community

[1] EPA's regulations implementing the Safe Drinking Water Act define a public water system as "a system for the provision to the public of water for human consumption through pipes or, after August 5, 1998, other constructed conveyances, if such system has at least fifteen service connections or regularly serves an average of at least twenty-five individuals daily at least 60 days out of the year." 40 C.F.R. § 141.2. EPA further divides public water systems into two categories referred to as "community water systems" and "non-community water systems." A "community water system" is defined as "a public water system which serves at least 15 service connections used by

water systems and smaller public water systems (such as businesses, restaurants and churches) qualify as non-community water systems. Non-community water systems are further classified by EPA as non-transient non-community water systems ("NTNCWSs") and transient non-community water systems ("TNCWSs"). If validated data show that PFOA is present in a non-community water system at a concentration exceeding 0.07 ppb, thereby qualifying the non-community water system for GAC treatment or a functionally equivalent alternative (as determined by Chemours and approved by EPA), the non-community water system, whether an NTNCWS or a TNCWS, may be addressed in the same manner as a private water system. For example, a drinking water well at a gas station or church may be treated as if it is a private drinking water well for purposes of this Model Water Treatment Plan even if it otherwise qualifies as an NTNCWS or a TNCWS. The Model Water Treatment Plan covers both community and non-community water systems, as described below. References herein to private water systems shall be understood to include non-community water systems that are being addressed as if they are private water systems.

The Model Water Treatment Plan for private water systems (including non-community water systems) where GAC treatment is offered pursuant to the 2009 Consent Order as amended is described below in Section 2.0. The Model Water Treatment Plan for private water systems (including non-community water systems) where an EPA-approved alternative to GAC treatment is offered is described below in Section 3.0. The basic elements of the Model Water Treatment Plan for installation of GAC treatment at a public water system qualifying as a community water system are described below in Section 4.0. Each community public water system that qualifies for treatment is likely to be unique. Therefore, a system-specific water treatment plan will be developed for each community public water system that qualifies for GAC treatment under the 2009 Consent Order as amended. These system-specific plans will be developed after the needed information from each system is acquired. The process that will be followed if an alternative form of treatment for a community public water system is proposed is presented in Section 5.0.

year-round residents or regularly serves at least 25 year-round residents." 40 C.F.R. § 141.2. A "non-community water system" means a public water system that is not a community water system and that is either a transient non-community water system or a non-transient non-community water system. 40 C.F.R. § 141.2. Both of the subcategories of non-community water systems are further defined by EPA. A "transient non-community water system" is "a non-community water system that does not regularly serve at least 25 of the same persons over six months per year" while a "non-transient non-community water system" is "a public water system that is not a community water system and that regularly serves at least 25 of the same persons over 6 months per year." 40 C.F.R. § 141.2.

2.0 PRIVATE WATER SYSTEMS – GAC TREATMENT

The 2009 Consent Order as amended requires that additional surveying and sampling be conducted of private water systems. For each private water system that is sampled where validated sampling results for PFOA are greater than 0.07 ppb and GAC treatment is offered, Chemours (or its authorized representative) will follow the elements of the Model Water Treatment Plan described below. This Model Water Treatment Plan consists of a series of steps that must be completed sequentially. The outcomes of the specific steps will be communicated to EPA by documentation in spreadsheets provided to EPA and in the quarterly progress reports that are to be submitted to EPA as the steps are completed. Copies of the quarterly progress reports are also being submitted to the West Virginia Department of Health and Human Resources ("WVDHHR"), the West Virginia Department of Environmental Protection ("WVDEP"), the Ohio Department of Health ("ODH") and the Ohio Environmental Protection Agency ("OEPA"). The same process will be used for non-community water systems that are being addressed in the same manner as private water systems.

2.1 Step One – Documentation

The first step in the Model Water Treatment Plan for installation of a GAC treatment system at a private water system that has been determined to be eligible for treatment consists of sending to the owner of the private water system[2] a letter presenting the final results of sampling of the private water system and confirming that the private water system is qualified for treatment. A typical form of such a letter is included in Attachment 1. Once the letter presenting the sampling results is mailed to the owner of the private water system and a copy of the letter is sent to EPA, a Chemours representative will contact the owner of the private water system, explain that the private water system is qualified for treatment and make the offer of GAC treatment at no cost to the owner.

Chemours (or its authorized representative) may, at its discretion, upon receipt of draft sampling results and completion of internal data review, contact the owner of a private water system that is qualified for GAC treatment and verbally make the offer for installation of a GAC treatment system based on the reviewed draft sampling results. In this situation, the final validated sampling results will be mailed to the owner of the private water system when available.

If a private water system owner accepts the offer of GAC treatment, Chemours (or its authorized representative) will notify EPA in spreadsheets and provide documentation in the subsequent quarterly progress report to be submitted to EPA (with copies to WVDHHR, WVDEP, ODH and OEPA). If a private water system owner chooses to decline the offer of GAC treatment from Chemours, Chemours (or its authorized representative) will request signed confirmation of the decision by the owner to decline GAC treatment (see Attachment 1), will notify EPA of the decline of the offer, and will

[2] In situations where the person using the private water system is not the private water system owner (e.g., the tenant in a rental property), all documentation will be sent to and must be signed by the private water system owner. The owner in turn can share the information with the tenant, as appropriate. The private water system owner may also allow for direct communication with the tenant on his behalf if he chooses to do so and notifies Chemours (and/or its authorized representative).

provide documentation in spreadsheets and in the subsequent quarterly progress report to be submitted to EPA (with copies to WVDHHR, WVDEP, ODH and OEPA). If the private water system owner declines the offer of GAC treatment, Chemours will place the name of the owner on a list being maintained by Chemours of public and private systems that declined or did not respond to offers of temporary or permanent alternate drinking water supplies (the "Decline and Non-Response List"), and will contact such owner on an annual basis within 30 days after the effective date of the 2009 Consent Order as amended to seek such owner's current response to the offer of provision of GAC treatment. Chemours will update the Decline and Non-Response List as new information becomes available and will include the current version of the Decline and Non-Response List with each quarterly progress report to be submitted to EPA (with copies to WVDHHR, WVDEP, ODH and OEPA).

If a private water system owner does not respond to the offer for treatment within 30 days after the offer is made, Chemours (or its authorized representative) will recontact the private water system owner send a follow-up letter and repeat the offer. If the private water system owner does not respond to the second offer letter within 45 days after the initial offer is made, Chemours (or its authorized representative) will notify EPA within 10 additional days and will consider the owner of the private water system to have declined the offer of GAC treatment by virtue of a non-response. Chemours will provide supporting information to EPA in spreadsheets and in the subsequent quarterly progress report to be submitted to EPA (with copies to WVDHHR, WVDEP, ODH and OEPA). In addition, Chemours will place the name of the owner on the Decline and Non-Response List that Chemours is maintaining, and will contact such owner on an annual basis within 30 days after the effective date of the 2009 Consent Order as amended to seek such owner's current response to the offer of provision of GAC treatment.

2.2 Step Two – Interview and System Design

Upon verbal acceptance of the offer of GAC treatment, the second step of the Model Water Treatment Plan will be implemented. As part of this second step, Chemours (and/or its authorized representatives) will schedule and conduct an interview with the owner of the private water system that has been determined to be eligible for GAC treatment. The purpose of this interview is to discuss with and have the owner sign the Granular Activated Carbon Treatment System Installation, Operation, and Maintenance Agreement (a copy of which is included in Attachment 2) and fill out the Private Well Questionnaire (a copy of which is included in Attachment 3) which will identify any specific conditions at or within the residence using the private water system that may require a modification of the typical GAC treatment system design. The typical GAC treatment system is described in Figure 1 and consists of two carbon tanks (beds) in series (referred to as Bed 1 and Bed 2) with sampling ports located before Bed 1 (the prior-to-treatment sampling location or "PT"), after Bed 1 (the Bed 1 sampling location or "Bed 1") and after Bed 2 (the Bed 2 sampling location or "Bed 2"). The "Bed 2" sampling port allows for sampling of the treated water that is used in the residence or other location being supplied by the private water system. If a significant design modification from the typical GAC treatment system is required based on the information obtained during the interview, Chemours (and/or its authorized representatives) will provide supporting documentation regarding the design modification in the subsequent quarterly progress report to be submitted to EPA (with copies to WVDHHR, WVDEP, ODH and OEPA).

2.3 Step Three – Geochemical/Biological Parameters Sampling and Permitting

In the third step of implementing the Model Treatment Plan for a private water system where GAC treatment is planned to be installed, Chemours (and/or its authorized representatives) will resample the private water system and analyze the water samples for iron, manganese, and total suspended solids. The results of these analyses for geochemical parameters will be used to determine if additional design modifications to the GAC system are required based on the chemistry of the well water. In addition, based on requirements imposed by ODH as discussed below, water samples from a private water system in Ohio that is eligible for a GAC treatment system will be analyzed for total coliform.

Upon receipt and evaluation of the analytical results for geochemical parameters from a private water system located in West Virginia and a determination that installation of a GAC treatment system is feasible, the private water system will be added to the GAC treatment system installation schedule. However, if the private water system is located in Ohio, a permit to install the GAC treatment system must first be obtained from ODH and the local health department ("LHD"). A copy of the application form for a permit from ODH and the LHD to install a GAC treatment system is included in Attachment 4. Chemours (and/or its authorized representatives) will begin the process of obtaining the required permit for installation of the GAC treatment system once the analytical results for geochemical parameters and total coliform have been obtained. ODH requires that concentrations of total coliform in the untreated water be below the criteria established by ODH before installation of the GAC treatment system can take place. If concentrations of total coliform are reported in the water samples from the private water system at levels above the criteria established by ODH, disinfection procedures, as recommended by ODH, are required to be conducted by the private water system owner or the Chemours representative until concentrations of total coliform are below detection limits in the water from the private water system. A copy of a fact sheet issued by ODH describing procedures to disinfect wells containing total coliform is included in Attachment 5. Following receipt of the necessary permit from ODH and the LHD, the private water system will be added to the GAC treatment system installation schedule.

Chemours will act to initiate design of the GAC treatment system and seek necessary regulatory permits to facilitate installation of the GAC treatment system within 30 days after receiving validated data from the private water system showing that the private water system is qualified for installation of a GAC treatment system.

2.4 Step Four – System Installation

In general, for a private water system located in West Virginia using a typical GAC treatment system, it takes approximately one week to complete the installation of the GAC treatment system from the point in time at which Chemours (and/or its authorized representatives) has received a signed operation and maintenance agreement and a completed private well questionnaire from the owner of the private water system and has completed an interview with the owner of the private water system. In general, for a private water system located in Ohio using a typical GAC treatment system, it takes

approximately two weeks from the same starting point to install a typical GAC treatment system due to the need to obtain a permit from ODH and the LHD for installation of the system. However, scheduling the interview with the owner of the private water system, getting necessary paperwork in place and obtaining access to the residence (or similar location in the case of a non-community water system) for the installation of the GAC treatment system can significantly extend the total time necessary to complete an installation, particularly if a large number of locations are on the GAC treatment system installation schedule. In addition, if design modifications are required for any reason, including, but not limited to, the configuration of the existing water source or the water system having multiple water sources, or if disinfection of the well is needed, additional delays may be encountered that are beyond Chemours' control prior to installation of the GAC treatment system.

Upon completion of installation of a GAC treatment system, Chemours will notify EPA and either WVDHHR and WVDEP (for a GAC treatment system installed in West Virginia), or ODH and OEPA (for a GAC treatment system installed in Ohio) of the installation by documentation in spreadsheets and in the quarterly progress reports that are to be submitted to EPA (with copies to WVDHHR, WVDEP, ODH and OEPA). In addition, upon installation of the GAC treatment system, the provision of a temporary alternate drinking water supply for the private water system will be terminated.

2.5 Step Five – Operation, ~~and~~ Maintenance and Monitoring

Following installation of a GAC treatment system, Chemours (and/or its authorized representatives) will begin to conduct post installation monitoring of the GAC treatment system as described below.

Operation, maintenance, and monitoring (OM&M) sampling is implemented on one of three different timeframes based on the historical performance of the individual GAC system:

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- 3-month (quarterly sampling), or
- 6-month (semiannual sampling), or
- 12-month (annual sampling)

GAC treatment systems with less than eight quarters of sampling data will ~~be~~ continue to be sampled quarterly until eight quarters of data are available. Evaluation of monitoring frequency will be performed each year for all systems with historical performance or at least eight quarters of sampling data to determine the appropriate sampling frequency (see Attachment 6 which provides details of the program sampling frequency). The annual evaluation will be performed after the second quarter results are finalized. The results of the annual evaluations will be included in the fourth quarter and annual report each year starting with the fourth quarter and annual report for 2020.

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The quarterly, semiannual or annual monitoring of the GAC systems focuses on the lead carbon bed or "Bed 1" water sample. Water samples collected as part of post installation monitoring are analyzed for PFOA. The water samples will be collected as

described in the Quality Assurance Project Plan for the PFOA Drinking-Water Sampling Program (AECOM, 2018).

When the analytical results from the lead carbon bed or "Bed 1" water sample indicate that PFOA is present at a concentration of 0.015 ppb or greater, Chemours (and/or its authorized representatives) will perform a carbon bed changeout. During the carbon bed changeout process, Bed 1 is removed, Bed 2 is moved to the Bed 1 position and a new activated carbon tank is installed in the Bed 2 position. A cCarbon beds will also be replaced if it either Bed 1 or Bed 2 has been operational for five years without having been replaced.

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Once a year, a "PT" water sample (untreated water from the private water system) will also be collected. This annual sampling will typically be conducted during the third quarter of each year. If the concentration of PFOA in the "PT" water sample is 0.07 ppb or less for two consecutive annual sampling events, then the "PT" water sampling frequency may change from annually to quarterly to demonstrate to the satisfaction of EPA that the levels of PFOA in the source water for the private water system are 0.07 ppb or less for four consecutive quarters and GAC treatment can be terminated.

Regardless of the sampling event frequency, if an issue arises with the operation or performance of a GAC treatment system, the well owner can contact the Chemours representative who will perform an operation and maintenance evaluation of the system to resolve the issue. Chemours will notify EPA of these situations by documentation in spreadsheets and in the quarterly progress reports that are to be submitted to EPA (with copies to WVDHHR, WVDEP, ODH and OEPA).

Chemours will provide for the OM&M operation and maintenance ("O&M") of the GAC treatment system consistent with the specific terms of the Granular Activated Carbon Treatment System Installation, Operation, and Maintenance Agreement until Chemours demonstrates to the satisfaction of EPA that the private water system's source water prior to treatment contains PFOA at concentrations equal to or less than 0.07 ppb for four consecutive quarters thereby allowing GAC treatment to be terminated. Following termination of GAC treatment, Chemours will conduct annual monitoring of the source water for the private system for five years. All monitoring data for GAC treatment systems will be documented in the quarterly progress reports that are to be provided to EPA.

3.0 PRIVATE WATER SYSTEMS - ALTERNATIVE TREATMENT

For some private water systems where validated sampling results show that PFOA is present at concentrations greater than 0.07 ppb, a functionally equivalent alternative to installation of a GAC treatment system may be offered by Chemours, if approved by EPA. Connection to a public water system containing PFOA at concentrations equal to or less than 0.07 ppb in finished water is the most commonly offered form of alternative treatment. For locations where connection of a private water system to a public water system containing PFOA at concentrations equal to or less than 0.07 ppb in finished water will be offered as an alternative to installation of a GAC treatment system, Chemours will notify EPA and obtain EPA's approval prior to offering the owner of the private water system connection to the public water system. If an alternative other than connection to a public water system is offered, Chemours will notify EPA and obtain approval prior to offering the alternative to the owner of the private water system.

The first step in the Model Water Treatment Plan for connection of a private water system to a public water system containing PFOA at concentrations equal to or less than 0.07 ppb in finished water consists of sending to the owner of the private water system[3] a letter presenting the results of sampling of the private water system and confirming that the private water system is qualified for treatment (see Attachment 1). Once the letter presenting the sampling results is mailed to the owner of the private water system and a copy of the letter is sent to EPA, a Chemours representative will contact the owner of the private water system, explain that the private water system is qualified for treatment and make the offer to connect the private water system to a public water system containing PFOA at concentrations equal to or less than 0.07 ppb in finished water at no cost to the owner.

Chemours (or its authorized representative) may, at its discretion, upon receipt of draft sampling results and completion of internal data review, contact the owner of a private water system that is qualified for alternative treatment and verbally make the offer of alternative treatment based on the reviewed draft sampling results. In this situation, the final validated sampling results will be mailed to the owner of the private water system when available.

If a private water system owner chooses to decline the alternative treatment offer from Chemours, Chemours (or its authorized representative) will request signed confirmation of the decision by the owner to decline the offer (see Attachment 1), will notify EPA of the decline of the offer, and will provide documentation in spreadsheets and in the subsequent quarterly progress report to be submitted to EPA (with copies to WVDHHR, WVDEP, ODH and OEPA). Chemours will also place the name of the owner of the private water system on the Decline and Non-Response List and will contact such owner on an annual basis within 30 days after the effective date of the 2009 Consent Order as amended to seek such owner's current response to the offer of alternative treatment.

[3] As previously noted, in situations where the person using the private water system is not the private water system owner (e.g., the tenant in a rental property), all documentation will be sent to and must be signed by the private water system owner. The owner in turn can share the information with the tenant, as appropriate. The private water system owner may also allow for direct communication with the tenant on his behalf if he chooses to do so and notifies Chemours (or its authorized representative).

If a private water system owner does not respond to the offer for alternative treatment within 30 days after the offer is made, Chemours (or its authorized representative) will recontact the private water system ownersend a follow-up letter and repeat the offer. If the private water system owner does not respond to the second offer letter within 45 days after the initial offer is made, Chemours (or its authorized representative) will notify EPA within 10 additional days and will consider the owner of the private water system to have declined the offer by virtue of a non-response. Chemours will provide supporting documentation to EPA in spreadsheets and in the subsequent quarterly progress report to be submitted to EPA (with copies to WVDHHR, WVDEP, ODH and OEPA). In addition, Chemours will place the name of the owner on the Decline and Non-Response List that Chemours is maintaining, and will contact such owner on an annual basis within 30 days after the effective date of the 2009 Consent Order as amended to seek such owner's current response to the offer of provision of alternative treatment.

If the offer of connection to a public water system containing PFOA at concentrations equal to or less than 0.07 ppb in finished water is verbally accepted, Chemours will provide to the owner of the private water system a copy of the Public Water Connection Agreement contained in Attachment 6 for the owner to sign. Upon receipt of a Public Water Connection Agreement signed by the private water system owner, Chemours (and/or its authorized representatives) will act with deliberate speed to connect the private water system to the public water system. Upon connection to the public water system, the provision of a temporary alternate drinking water supply for the private water system will be terminated.

4.0 PUBLIC WATER SYSTEMS – GAC TREATMENT

As previously discussed, public water systems are classified by EPA either as "community water systems" or "non-community water systems." For purposes of the Model Water Treatment Plan, non-community water systems will typically be addressed in the same manner as private water systems. This section of the Model Water Treatment Plan focuses on public water systems that qualify as community water systems as defined by EPA.

If validated sampling results indicate that PFOA is present at concentrations exceeding 0.07 ppb in finished water supplies from a public water system that is a community water system and that is subject to the 2009 Consent Order as amended, the public water system will be qualified to receive an offer of GAC treatment. Assuming that an offer of GAC treatment is made to and accepted by the public water system, the steps set forth below will generally be completed in a sequential manner. Chemours anticipates that GAC treatment will be installed at all public water systems identified under the 2009 Consent Order as amended as requiring treatment. The Model Water Treatment Plan will have to be modified to match the specific site conditions identified at each public water system qualified for treatment. In addition, because public water systems vary in size and have differing numbers of production wells, the specific tasks required for installation of GAC treatment for a public water system may not be the same for each GAC treatment system that is installed. Therefore, the tasks listed below may not be completed for some public water systems and may include items not required for others:

- ☐ (If needed, collect ~~an 18 gallon a water~~ sample to test for water quality and conduct an Accelerated Column Test ("ACT")
- ☐ Prepare concept and preliminary designs of the GAC treatment system for review with the owner of the public water system
- ☐ Prepare final design of the GAC treatment system for approval by the owner of the public water system
- ☐ Prepare final design of GAC treatment system for state permit application (OEPA or WVDHHR)
- ☐ Prepare application for submission to the West Virginia Public Service Commission ("PSC") (West Virginia locations only)
- ☐ Obtain permit approvals (and PSC approval for facilities in West Virginia)
- ☐ Request bids from construction contractors
- ☐ Review bids and award construction contract
- ☐ Obtain approvals from water boards and signed access/O&M agreements from the owner of the public water system
- ☐ Mobilize for construction work
- ☐ Construction of GAC treatment system
- ☐ Start-up of GAC treatment system
- ☐ Site restoration
- ☐ Demobilization
- ☐ Turn over facility to owner of public water system

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Where a public water system subject to the 2009 Consent Order as amended is identified that has PFOA present in finished water supplies at concentrations greater than 0.07 ppb based on validated sampling results and is therefore qualified to receive GAC treatment, Chemours will provide a public water system-specific draft Model Water

Treatment Plan to EPA that will identify the required tasks for installation of GAC treatment at that public water system. This public water system-specific draft Model Water Treatment Plan will be provided to EPA within 30 days after completion of the validation of the sampling results that show that the public water system is qualified to receive GAC treatment.

Following installation of a GAC treatment system for a public water system, Chemours will notify EPA, and either WVDHHR and WVDEP (for a GAC treatment system installed in West Virginia), or ODH and OEPA (for a GAC treatment system installed in Ohio) of the installation. Completion of the installation of the GAC treatment system will be documented in the quarterly progress reports that are to be submitted to EPA (with copies to WVDHHR, WVDEP, ODH and OEPA). Upon installation of the GAC treatment system, Chemours (and/or its authorized representatives) will collect a confirmation sample to demonstrate proper operation of the newly installed GAC treatment system and the removal of PFOA to a concentration at or below 0.07 ppb. Following receipt of a validated sample confirming the proper operation of a newly installed GAC treatment system, the provision of a temporary alternate drinking water supply for the public water system will be terminated. In addition, post installation O&M monitoring of the GAC treatment system will be conducted, as described below.

Post installation O&M monitoring (typically on a monthly or quarterly basis) will be conducted as required by OEPA or WVDHHR, as applicable. Monitoring of a public water system's GAC treatment system will consist of collecting a pre-treatment ("PT") water sample and two after-treatment water samples designated "lead" and "lag," representing the sample port after the lead carbon bed and the second, or lag, carbon bed, respectively. If the system consists of more than one treatment train, the "lead" and "lag" ports will be sampled for all the treatment trains. The water samples will be analyzed for PFOA. The water samples will be collected as described in Quality Assurance Project Plan for the PFOA Drinking-Water Sampling Program (AECOM, 2018).

If PFOA is detected at a concentration of 0.015 ppb or greater in the "lag" water sample obtained from the sample port after the lag carbon bed, the carbon bed will be replaced. If the GAC treatment system consists of two pairs of lead/lag carbon beds in parallel, a changeout will take place when both lag beds reach the criterion. If only one bed is above criterion, flow will be balanced among the lag beds and/or a changeout may be performed~~a changeout will take place even if the foregoing criterion is reached in only one of the lag beds~~. Once PFOA has been detected at a concentration in the water sample(s) from the lag bed(s) equal to or greater than 0.015 ppb, the carbon in the lead bed(s) will be replaced, the lag bed(s) will be moved into the lead bed position, and the bed(s) with the replaced carbon will be moved into the lag bed(s) position.

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Chemours will provide for O&M of the GAC treatment system consistent with the specific terms of the O&M agreement with the owner of the public water system until Chemours demonstrates to the satisfaction of EPA that the public water system's source water prior to treatment contains PFOA at concentrations equal to or less than 0.07 ppb for four consecutive quarters thereby allowing GAC treatment be terminated. Following termination of GAC treatment, Chemours will conduct annual monitoring of the source water for the public water system for five years.

Chemours will provide EPA with the installation status of each public water system that qualifies for GAC treatment in the quarterly progress reports that are to be submitted to EPA.

5.0 PUBLIC WATER SYSTEMS – ALTERNATIVE TREATMENT

A public water system that is a community water system and qualifies for treatment pursuant to the 2009 Consent Order as amended may be addressed through an alternative other than treatment using a GAC treatment system. For example, such a public water system might be connected to another public water system containing PFOA at concentrations equal to or less than 0.07 ppb in finished water. The circumstances where such an alternative may be proposed will necessarily involve a variety of site-specific factors. Should Chemours wish to propose the use of an alternative form of treatment, it will provide EPA with a site-specific Water Treatment Plan for EPA's approval describing the alternative form of treatment and the manner in which the alternative form of treatment will be implemented.